JTH Tax, Inc. v. Whitaker Doc. 29

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

JTH TAX, INC. d/b/a LIBERTY TAX SERVICE	:	
Plaintiff	:	
vs.	:	Civil No. 2:07CV170
KENYA WHITAKER	:	
Defendant	:	

MOTION TO CURE DEFECT

Defendants Kenya Whitaker and Easy Software Solutions, LLC, by counsel, CARR MALONEY P.C., respectfully move this Court pursuant to LCvR 7(B) to accept the entry of appearance of counsel as curing the defects in Defendant's Motion to Transfer (#10) and Motion to Stay (#11) for the following reasons:

1. On May 10, 2007 Kenya Whitaker, *pro se*, filed her Motion to Transfer and Motion to Stay.

2. These *pro se* motions failed to include an address or telephone number as required by LCvR 7(B). This Court allowed the filings of said motions subject to their defects.

3. Above referenced counsel has now entered their appearance on behalf of Kenya Whitaker and Easy Software Solutions, LLC, providing their office address and telephone number as required by LCvR 7(B).

WHEREFORE, Defendant respectfully requests that the Court amend the docket to cure the defects associated with the Motion to Transfer (#10) and the Motion to Stay (#11)

Dockets.Justia.com

KENYA WHITAKER
EASY SOFTWARE SOLUTIONS, LLC

By: /s/ Dennis J. Quinn________
Counsel for Kenya Whitaker

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served electronically, this 22nd day of May, 2007, to:

Vanessa M. Szajnoga, Esquire
Corporate Counsel
Liberty Tax Service
1716 Corporate Landing Parkway
Virginia Beach, VA 23454

/s/ Dennis J. Quinn________
Dennis J. Quinn